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July 6, 2001

Mr. William English,
Air Traffic Group Chairman
Accident DCA 01MA034
National Transportation Safety Board
Washington, DC

Dear Mr. English:

As part of your investigation of the Aspen, Colorado Part 135 Gulfstream accident I understand you are evaluating the FAA's National Flight Procedures Office (AVN-100) role in the effective, timely publication and review of standard instrument approach procedures (SIAPs). This statement will provide you with information that I have obtained about AVN-100 during the past several years.

As you know, I am a retired TWA pilot and former chairman of ALPA's Terminal Instrument Procedures Committee, now known as the Charting and Instrument Procedures (CHIPs) Group. Since 1993 I have consulted to the CHIPs Group, and other ALPA technical safety functions such as All-Weather Flying and Air Traffic Procedures. In this letter I am not representing ALPA, but stating my views based on my consulting work for ALPA.

As part of my consulting duties I interface with AVN-100 on several levels. One of those duties involves receiving coordination packages from the geographical branch that handles much of the Western U.S. and Hawaii, AVN-120. These coordination packages are required under the Administrative Procedures Act because amendments to SIAPs are individual amendments to Federal Aviation Regulation Part 97. Not only is this a legal requirement, but also of far greater importance it provides knowledgeable aviation users the opportunity to provide operational and safety inputs before a SIAP is cast in its final form.

The process does not work well, however, because users are seldom encouraged by the FAA to participate in the early stages of SIAP design, although there is an effort underway to improve user input at the regional level. Time will tell whether that will be effective.

The present coordination mailings seem to be an afterthought on the part of at least AVN-120. They are sometimes incomplete. More often though, they are mailed late, which effectively reduces the opportunity for comment to far less than what internal FAA policy dictates.

I have complained about this on numerous occasions to the division level with copies to Mr. Tom Accardi, AVN-1. The most recent incident happened this past week when packages for KSFO and KSEA were mailed two weeks after the date on the transmittal letters. The date on the transmittal letter triggers the 30-day comment period. I again complained about this to Mr. Russ Jones, AVN-100, by email several days ago, with copy to Mr. Accardi. Thus far, I have received no response.

It is my considered view that no one in AVN takes the coordination process seriously. In fact, I have it on reliable source that the present rank-and-file work force resents any input or feedback from ALPA and, I presume, from other user groups as well. Just over two years ago the AVN work force's union wrote to the president of ALPA, attempting to get me terminated because I was being too critical of their work. I believe this is significant information for the Board to consider in its review of the staffing and work-product issues at AVN-100. I don't mean to suggest that the procedure design they do is not compliant with criteria, but minimum compliance with criteria does not necessarily result in a good procedure.

Along this line, ALPA is excluded by FAA policy from reviewing airports that the FAA deems as not being "ALPA airports." The other user groups, such as AOPA and NBAA are not so limited. I find this to be unreasonable, because ALPA represents small commuter carriers in addition to giant national carriers. Our commuter carriers can do on-demand commercial operations into all but the smallest of airports. Further, ALPA is one of the most active user groups in the continuing industry/FAA efforts to detect problems with criteria and implementation policies, and related efforts. In that vein, ALPA should review all public terminal instrument procedures that are being coordinated by the FAA.

Sincerely,

A handwritten signature in black ink, which appears to read "Wallace B. Roberts", is written over a thick black horizontal redaction bar.

Wallace B. Roberts